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**COUNSEL FOR THE DISTRICT OF  
COLUMBIA, BY KARL A. RACINE,  
ATTORNEY GENERAL FOR THE  
DISTRICT OF COLUMBIA**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	<b>§</b>	
	<b>§</b>	<b>CASE NO. 21-30085-hdh-11</b>
<b>NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,</b>	<b>§</b>	
	<b>§</b>	<b>CHAPTER 11</b>
<b>Debtors.<sup>1</sup></b>	<b>§</b>	
	<b>§</b>	<b>Jointly Administered</b>

**THE DISTRICT OF COLUMBIA'S MOTION IN SUPPORT IN THE STATE OF NEW  
YORK'S MOTION TO DISMISS**

**TO THE HONORABLE HARLIN D. HALE,  
CHIEF UNITED STATES BANKRUPTCY JUDGE:**

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<sup>1</sup> The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

1. The District of Columbia (the “District”), through its Attorney General, a party-in-interest in the above-referenced bankruptcy proceeding, hereby files this Motion in Support of the State of New York’s Motion to Dismiss <sup>2</sup> (“District’s Motion”).

2. On February 23, 2021, the District filed its Motion in Support of the State of New York’s Motion to Appoint Chapter 11 Trustee (“Motion to Support”) [Docket No. 214]. In that motion, the District agreed with the State of New York (“New York”) that, to the extent that the Debtor National Rifle Association of America, Inc. (NRA) is using the bankruptcy process to subvert the regulatory authority and oversight of the state of New York where the NRA is duly incorporated, this action is improper and abusive of the authority and purposes of this Court.

3. Since the filing of the District’s Motion in Support, documents and testimony provided in these proceedings have shown that the NRA’s use of the bankruptcy process was not duly authorized by its Board, and that the NRA’s Executive Vice President circumvented the NRA’s requirements that its Board authorize such actions.

4. Given this conduct in circumvention of Board authority, the District concurs with New York that the NRA’s petition was filed absent the requisite good faith, and good cause exists to warrant dismissal.

5. For these reasons, the District now joins New York’s request to dismiss the NRA’s Petition.

Dated: March 26, 2021

Respectfully submitted,

KARL A. RACINE  
Attorney General for the District of Columbia

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<sup>2</sup> The State of New York’s Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee [Docket No. 155] and State of New York Brief in Support of Motion to Dismiss, or in The Alternative Appoint Chapter 11 Trustee (Feb. 12, 2021) [Docket No. 156].

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*/s/ Leonor Miranda*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2021, a true and correct copy of the foregoing was served upon all parties entitled to notice, including the Debtors and United States Trustee, via the Court's electronic transmission facilities.

*/s/ Nancy L. Alper*  
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